## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

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UNITED STATES SECURITIES	:
AND EXCHANGE COMMISSION,	:

Plaintiff,

v.

MARLON QUAN, ACORN CAPITAL GROUP, LLC and STEWARDSHIP INVESTMENT ADVISORS, LLC,

Defendants,

and

FLORENE QUAN,

Relief Defendant.

CIVIL ACTION 0:11-cv-00723-ADM-JSM

## PLAINTIFF SECURITIES & EXCHANGE COMMISSION'S MOTION FOR (1) APPOINTMENT OF A RECEIVER AND (2) AN ANTI-SUIT INJUNCTION

Plaintiff U.S. Securities & Exchange Commission (the "Commission") respectfully moves this Court for an order (1) appointing a receiver over the funds that have been frozen by the Court in this matter, Stewardship Credit Arbitrage Fund, LLC ("SCAF, LLC"), and its subsidiaries (Livingston Acres, LLC and Putnam Green, LLC), (2) staying enforcement of any judgments against the frozen funds, SCAF, LLC and/or its subsidiaries and (3) enjoining the filing of any bankruptcy petitions (voluntary or involuntary) naming SCAF, LLC or its

subsidiaries as debtors. In support of this Motion, the Commission is simultaneously filing a Memorandum in Support, the Declaration of Donald Ryba and supporting exhibits.

Respectfully Submitted,

## U.S. SECURITIES & EXCHANGE COMMISSION

s/ Sally J. Hewitt John E. Birkenheier (IL #6270993) Charles J. Kerstetter (PA #67088) Sally J. Hewitt (IL #6193997) Attorneys for Plaintiff U.S. Securities and Exchange Commission Chicago Regional Office 175 West Jackson Blvd. Suite 900 Chicago, Illinois 60604 T. (312) 353-7390 F. (312) 353-7398 birkenheierj@sec.gov kerstetterc@sec.gov hewitts@sec.gov

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Dated: February 17, 2012